

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

JANE DOES 1-6, et al.,

Plaintiffs,

v.

JANET T. MILLS, in her official capacity as
the Governor of the State of Maine, et al.,

Defendants.

Civil Action No. 1:21-cv-00242-JDL

DECLARATION OF KIMBERLY L. PATWARDHAN, AAG

1. My name is Kimberly L. Patwardhan. I am an Assistant Attorney General for the State of Maine.
2. The statements made in this declaration are based upon my personal knowledge.
3. Attached hereto as Exhibit 1 is a true and accurate copy *An Act To Protect Maine Children and Students from Preventable Diseases by Repealing Certain Exemptions from the Laws Governing Immunization Requirements*, L.D. 798 (129th Legis. 2019).
4. According to records kept by the Maine Legislature and made publicly available, there was a public hearing on L.D. 798 on March 13, 2019. Hundreds of interested persons submitted written testimony in favor of, in opposition to, or neither for nor against L.D. 798.
5. The Maine Legislature published the written testimony on L.D. 798 on its website. In addition, the Maine State Law and Legislative Reference Library publishes Maine legislative documents on its website and makes the contents of Maine legislative committee files available on request.

6. Attached hereto as Exhibit 2 is a true and accurate copy of the testimony of Representative Ryan Tipping, one of the bill's sponsors, on L.D. 798, which testimony is available on the Maine Legislature's website.
7. Attached hereto as Exhibit 3 is a true and accurate copy of the testimony of Representative Genevieve McDonald, one of the bill's sponsors, on L.D. 798, which testimony is available on the Maine Legislature's website.
8. Attached hereto as Exhibit 4 is a true and accurate copy of the testimony of Nancy Beardsley, Acting Director of the Maine Center for Disease Control and Prevention, on L.D. 798, which testimony is available on the Maine Legislature's website.
9. Attached hereto as Exhibit 5 is a true and accurate copy of the testimony of Rebecca Boulos on behalf of the Maine Public Health Association on L.D. 798, which testimony is available on the Maine Legislature's website.
10. Attached hereto as Exhibit 6 is a true and accurate copy of the testimony of James Madara, on behalf of the American Medical Association, on L.D. 798, which testimony is available on the Maine Legislature's website.
11. Attached hereto as Exhibit 7 is a true and accurate copy of the testimony of Deborah Hagler, M.D., on behalf of the American Academy of Pediatrics, on L.D. 798, which testimony is available on the Maine Legislature's website.
12. Attached hereto as Exhibit 8 is a true and accurate copy of the testimony of Patricia Endsley, from the Maine Association of School Nurses on L.D. 798, which testimony is available on the Maine Legislature's website.

13. Attached hereto as Exhibit 9 is a true and accurate copy of the testimony of Lisa Harvey-McPherson, on behalf of Northern Light, on L.D. 798, which testimony is available on the Maine Legislature's website.
14. Attached hereto as Exhibit 10 is a true and accurate copy of the testimony of Rebecca Hemphill, M.D., on behalf of MaineHealth, on L.D. 798, which testimony is available on the Maine Legislature's website.
15. Attached hereto as Exhibit 11 is a true and accurate copy of the testimony of Stanley Chaleff, M.D. on L.D. 798, which testimony is available on the Maine Legislature's website.
16. Attached hereto as Exhibit 12 is a true and accurate copy of the testimony of Tin Ha-Ngoc, M.D. of Maine on L.D. 798, which testimony is available on the Maine Legislature's website.
17. Attached hereto as Exhibit 13 is a true and accurate copy of the testimony of Emily Keller, M.D. on L.D. 798, which testimony is available on the Maine Legislature's website.
18. Attached hereto as Exhibit 14 is a true and accurate copy of the testimony of Juliana L'Heureux of the American Nurses Association of Maine on L.D. 798, which testimony is available on the Maine Legislature's website.
19. Attached hereto as Exhibit 15 is a true and accurate copy of the testimony of Peggy McRae on behalf of the Nursing Leaders of Maine on L.D. 798, which testimony is available on the Maine Legislature's website.
20. Attached hereto as Exhibit 16 is a true and accurate copy of the testimony of Jennifer Wriggins, Esq. of Maine on L.D. 798, which testimony is available on the Maine Legislature's website.

21. Attached hereto as Exhibit 17 is a true and accurate copy of the testimony of Suzanne Lafreniere, on behalf of the Roman Catholic Diocese of Portland, on L.D. 798, which testimony is available on the Maine Legislature's website.
22. Attached here to as Exhibit 18 is a true and accurate copy of the article by John D. Grabenstein, *What the World's religions teach, applied to vaccines and immune globulins*, which was published in the February 2013 issue of Vaccine and presented to the Education Committee during the consideration of L.D. 798. This article is available in the committee file of L.D. 798.
23. Attached hereto as Exhibit 19 is a true and accurate copy of Committee Amendment A to L.D. 798, which is available on the website of the Maine State Law and Legislative Reference Library.
24. Attached hereto as Exhibit 20 is a true and accurate copy of select pages of the Journal and Legislative Record of the Maine House of Representatives from April 23, 2019, that include remarks from the floor of the Maine House on L.D. 798.
25. Attached hereto as Exhibit 21 is a true and accurate copy of select pages of the Senate Legislative Record of the Maine Senate from May 2, 2019, that include remarks from the floor of the Maine Senate on L.D. 798.
26. Attached hereto as Exhibit 22 is a true and accurate copy of select pages of the Journal and Legislative Record of the Maine House of Representatives from May 7, 2019, that include remarks from the floor of the Maine House on L.D. 798.
27. Attached hereto as Exhibit 23 is a true and accurate copy of select pages of the Senate Legislative Record of the Maine Senate from May 14, 2019, that include remarks from the floor of the Maine Senate on L.D. 798.

28. Attached hereto as Exhibit 24 is a true and accurate copy of select pages of the Journal and Legislative Record of the Maine House of Representatives from May 21, 2019, that include remarks from the floor of the Maine House on L.D. 798.
29. Attached hereto as Exhibit 25 is a true and accurate copy of select pages of the Journal and Legislative Record of the Maine House of Representatives from May 23, 2019, that include remarks from the floor of the Maine House on L.D. 798.
30. Attached hereto as Exhibit 26 is a true and accurate copy of select pages of the Senate Legislative Record of the Maine Senate from May 23, 2019, that include remarks from the floor of the Maine Senate on L.D. 798.
31. Attached hereto as Exhibit 27 is a true and accurate copy of Chapter 154 of the Maine Public Laws from 2019, which was signed by the Governor on May 24, 2019.

I DECLARE, PURSUANT TO 28 U.S.C. § 1746, UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: September 15, 2021

/s/ Kimberly L. Patwardhan, AAG
Kimberly L. Patwardhan, AAG

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, I electronically filed this document and its attachments with the Clerk of the Court using the CM/ECF system and that the same will be sent electronically to registered participants as identified in the CM/ECF electronic filing system for this matter.

/s/ Kimberly L. Patwardhan
KIMBERLY L. PATWARDHAN
Assistant Attorney General
Office of the Attorney General
6 State House Station
Augusta ME 04333-0006
Tel. (207) 626-8570
Fax (207) 287-3145
kimberly.patwardhan@maine.gov